

Re: Part 97.505 changes in FCC-06-149A1

Although Element 1 credit has been proposed to be extended to anyone who has held an expired amateur radio license that can prove they passed the telegraphy exam, the proposed rule changes do not include:

1.) Technicians that have passed the telegraphy after April 15, 2000).

In this case, upgrade credit is only good within 365 days of the CSCE Element 1 credit(97.505(a)(6)). Before April 15, 2000, this element 1 credit would have locked in credit via the Technician Plus license.

2.) FCC issued commercial Radiotelegraph license expired for more than 5 years (97.505(a)(7)).

It seems to me that the Commission should give Element 1 to the above two case since, according to paragraph 56 of FCC-06-149A1, “they too have passed at least a 5 wpm telegraphy exam.” If the Commission eliminates time limits for the telegraphy exam in every other case, it would be consistent to do so in the above two cases.

Sincerely,  
James Mastro